

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

BLUEWIRE MEDIA, LLC	:	
and STEVEN ACITO,	:	
Plaintiffs,	:	CASE NO.: 1:13-cv-03667-NLH-KMW
	:	
v.	:	
	:	
GLOUCESTER COUNTY	:	
REPUBLICAN COMMITTEE,	:	ELECTRONICALLY FILED
GOP VICTORY 2011,	:	
MARK CIMINO, and	:	
JOHN DOES 1 THROUGH 10	:	
Defendants.	:	

**NOTICE OF DEFENDANTS' MOTION  
TO DISMISS PLAINTIFFS' COMPLAINT  
FOR FAILURE TO STATE A CLAIM UNDER FED. R. CIV. P. 12(b)(6)**

PLEASE TAKE NOTICE, that on September 3, 2013 at 9:30 a.m., or as soon as designated by the Court for counsel to be heard, the undersigned, attorneys for Defendants Gloucester County Republican Committee, GOP Victory 2011, and Mark Cimino, will move before the Honorable Noel Hillman, U.S.D.J., United States District Court for the District of New Jersey, at the John Gerry Courthouse, Camden, New Jersey, for an Order granting Defendant's Motion for Dismissal of Plaintiffs' Complaint.

The Defendants will rely upon the Memorandum in support of the Motion.

Oral argument is respectfully requested.

A proposed form of Order is included.

Respectfully submitted,

/s/ Anthony J. DiMarino, III

Date: August 5, 2013

Anthony J. DiMarino, III

Emmett S. Collazo

**A.J. DiMARINO, P.C.**

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Counsel for Defendants

Gloucester County

Republican Committee,

GOP Victory 2011, and

Mark Cimino